

REMARKS

Claims 1-40 are pending and stand rejected. Claims 1, 6, 8, 9, 10, 18, 19, 20, 30, 31, and 32 have been amended to remove the term "document" from appearing before the terms "production request" and "production plan." These amendments were made, not for reasons of patentability, but to clarify the claims making them consistent with the terminology used in the specification. Claim 38 has been amended to correct a problem with antecedent basis.

CLAIM OBJECTION: The Examiner objected to Claims 32-40 under 35 USC § 112. Claims 32 and 38 have been amended, as indicated above, to address the Examiner's concerns.

CLAIM REJECTIONS In the detailed action, the Examiner stated that Claims 1-18, 24, and 25 were rejected under §102 citing US Pub. 2001/0013947 to Van Der Linden. However, The Examiner addressed claims 19-23, 25-34, and 36-40 when explaining the §102 rejection. The Examiner rejected Claims 1-18, 24, and 35 under §103 as being unpatentable over Van Der Linden.

The Rule 131 Declaration of Hector Rodriguez, which accompanies this Response, documents that the subject matter claimed in this Application was conceived before the effective filing date of Van Der Linden and that a constructive reduction to practice was pursued thereafter with reasonable diligence as evidence by the June 2001 filing date of this Application. Van Der Linden, therefore, should be withdrawn as a prior art reference.

CONCLUSION: The foregoing is believed to be a complete response to the outstanding Office Action. Claims 1-40 are all felt to be in condition for allowance. Consequently, early and favorable action allowing these claims and passing the application to issue is earnestly solicited. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,



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